

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

UNITED STATES OF AMERICA	:	
	:	
v.	:	No. 2:16-CR-94
	:	
BRIAN FOLKS	:	

**DEFENDANT’S MOTION FOR ADDITIONAL TIME
TO FILE POST-TRIAL MOTIONS**

Defendant Brian Folks moves for an extension of time to file post-trial motions under Federal Rules of Criminal Procedure 29 and 30. After the verdict was reached on May 9, 2019, the Court set a deadline of two months from that date to file post-trial motions, until July 8, 2019. Mr. Folks seeks an extension of two weeks, until July 22, 2019, to file these motions.

The trial transcripts were completed on June 14, 2019. Defense counsel and Mr. Folks are in the process of reviewing all eleven days of transcripts, but need additional time to complete their review and to consult regarding the issues that Mr. Folks wishes to raise. Mr. Folks has identified a number of issues that he would like to have addressed, and defense counsel requires the extra time to research these issues in order to determine whether they can be included in this post-trial briefing. Defense counsel also has longstanding plans to be out of Vermont the first part of July.

Defense counsel asked counsel for the Government its position regarding this request for an extension of time to file post-trial motions. Counsel for the Government opposes this request for additional time.

Mr. Folks respectfully asks the Court to grant this request and extend the deadline for

filing post-trial motions until July 22, 2019.

Dated at Burlington and Brandon, Vermont this 25th day of June, 2019.

By: /s/ Mark Kaplan
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CERTIFICATE OF SERVICE

I certify that on the 25th day of June, 2019, I filed **Defendant's Motion for Additional Time to File Post-Trial Motions** by electronically filing it via the CM/ECF system, which will provide notice to Assistant U.S. Attorney Bill Darrow via Bill.Darrow@usdoj.gov, Trial Attorney Emily Savner via emily.savner@usdoj.gov, and Special Litigation Counsel Matthew Grady via Matthew.Grady@usdoj.gov.

By: /s/ Natasha Sen
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